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Attorneys for Defendant
MHM SOLUTIONS, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NAVDEEP DHALIWAL, an individual,

Plaintiff,

v.

MHM SOLUTIONS, LLC, a Foreign Limited
Liability Company; STATE OF NEVADA
BUREAU OF DISABILITY ADJUDICATION,
a Department of the State of Nevada,

Defendants.

Case No. 2:21-cv-00568-GMN-BNW

**STIPULATION AND [PROPOSED]
ORDER REGARDING PLAINTIFF'S
SECOND AMENDED COMPLAINT**

Pursuant to the Court's September 22, 2021 minute order (ECF No. 33), counsel for the parties met and conferred on September 29, 2021 and stipulate to the following:

1. The parties consent to Plaintiff's filing of the Second Amended Complaint (ECF No. 27).
2. Based upon information shared by counsel for Defendants regarding deficiencies they believe exist with respect to the Second Amended Complaint, Plaintiff may wish to file a third amended complaint. If Plaintiff chooses to file a third amended complaint following the Early Neutral Evaluation conference scheduled for October 5, 2021, Plaintiff will circulate to defense counsel a draft proposed third amended complaint by **October 19, 2021**. Counsel for the parties will thereafter meet and confer regarding the proposed third amended complaint and if agreement is reached, will file a stipulation consenting to the filing of it by **November 2, 2021**. If Defendants do not consent to filing

the proposed third amended complaint, Plaintiff will file a motion for leave to file a third amended complaint by **November 16, 2021**.

3. If Plaintiff elects not to file a third amended complaint, Plaintiff will notify Defendants by **November 2, 2021**. Defendants will then have until **November 16, 2021** to respond to the Second Amended Complaint (ECF No. 27).

4. The parties agree that the pending Motions to Dismiss the First Amended Complaint and Joinder (ECF Nos. 24, 25, 26) may be denied as moot.

Respectfully submitted,

Respectfully submitted,

/s/ Trevor Hatfield, Esq.
TREVOR J. HATFIELD, ESQ.
HATFIELD & ASSOCIATES, LTD.

Attorney for Plaintiff
NAVDEEP DHALIWAL

/s/ Amy L. Thompson, Esq.
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Attorneys for Defendant
MHM SOLUTIONS, LLC

Respectfully submitted,

/s/ Judy A. Prutzman, Esq.
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JUDY A. PRUTZMAN, ESQ.
CARRIE L. PARKER, ESQ.

Attorneys for Defendant
STATE OF NEVADA BUREAU OF
DISABILITY ADJUDICATION

ORDER

IT IS SO ORDERED.

Dated: October 5, 2021.


UNITED STATES MAGISTRATE JUDGE

4812-5310-2077.1 / 108840-1045